

REMARKS

I. Introduction

Claims 13 to 26 are currently pending in the present application. Claims 24 to 26 have been withdrawn from consideration. In view of the foregoing amendments and the following remarks, it is respectfully submitted that claims 13 to 23 are allowable, and reconsideration is respectfully requested.

Applicants note that an initialed copy of the PTO-1449 paper filed with the Information Disclosure Statement on March 4, 2002 have not been returned. Applicants respectfully request consideration of the Information Disclosure Statement, PTO-1449 paper and cited references with the next Office communication.

Applicants note with appreciation the indication that claim 22 is allowed.

II. Rejection of Claims 13, 14, 16 to 18, and 20 Under 35 U.S.C. § 102(b)

Claims 13, 14, 16 to 18, and 20 were rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent No. 5,046,857 ("Metzger et al."). It is respectfully submitted that Metzger et al. do not anticipate the present claims for the following reasons.

Claim 13 relates to a connection carrier and recites a positioning section and a locking section projecting over a width of the positioning section. The Office Action asserts that the terminals 17 and 19 of figure 3 of Metzger et al. disclose the positioning section, and that extensions 17c and 19c disclose the locking section. However, while Metzger et al. may refer to a premolded mounting member 40' that covers portions of the terminals 17 and 19, nowhere do Metzger et al. state that the terminals 17 and 19 are a positioning section, e.g., that are configured for positioning within the premolded mounting member 40'. Furthermore, the extensions 17c and 19c do not lock the terminals to the premolded mounting member 40'. Rather, they interlock the subassembly 14 with the shell 12.

Although Metzger et al. refer to extensions 17c and 19c that may interlock the subassembly 14 with the shell 12, nowhere do Metzger et al. disclose, or even suggest, a positioning section for positioning the subassembly 14 in a recess of the shell 12, and over a width of which the extensions project. More particularly, terminals 17 and 19, referred to by the Examiner as disclosing the recited positioning section, do not position the subassembly 14 in the shell 12. Accordingly, if the extensions 17c and 19c are relied on as disclosing the locking section, the terminals 17 and 19 cannot be relied on as disclosing the positioning section. Indeed, Metzger et al. do not disclose, or even suggest, a locking section that projects over a width of a positioning section, where the locking section is configured to anchor a connection carrier in an injection molded part into which the connection carrier is positioned by the positioning section.

In the Response to Amendment section, the Examiner admits that Metzger et al. do not mention in the specification the limitations of claim 13, but rather

asserts that the limitations are shown in the drawings, and generally refers to column 1, lines 40 to 59. However, the drawings do not show the recited limitations, and the section of the specification referred to by the Examiner is unrelated to the recited limitations.

Furthermore, to facilitate matters, claim 13 has been amended herein without prejudice to recite that the positioning section is configured for insertion into a positioning area of a slit-shaped recess of the injection-molded part, that the locking section is configured for insertion into a locking area of the recess that has a width greater than that of the positioning area, and that the locking section thereby anchors the connection carrier in the injection-molded part. Support for the amendments to claim 13 may be found in the Specification, e.g., at page 4, lines 6 to 22, and in the Figures, e.g., Fig. 1. It is respectfully submitted that Metzger et al. do not disclose, or even suggest, these limitations.

Thus, nowhere do Metzger et al. disclose, or even suggest, all of the limitations of claim 13. It is therefore respectfully submitted that Metzger et al. do not anticipate claim 13.

Claims 14, 16 to 18, and 20 ultimately depend from and therefore include all of the limitations of claim 13. It is therefore respectfully submitted that Metzger et al. do not anticipate these dependent claims for the same reasons set forth above in support of the patentability of claim 13.

III. Rejection of Claims 15, 19, 21 and 23 Under 35 U.S.C. § 103(a)

Claims 15, 19, 21 and 23 were rejected under 35 U.S.C. § 103(a) as unpatentable over Metzger et al. Applicants respectfully submit that Metzger et al. do not render unpatentable the present claims for the following reasons.

Claims 15, 19, 21 and 23 ultimately depend from claim 13. As set forth above in support of the patentability of claim 13, Metzger et al. do not disclose or suggest all of the limitations of claim 13. Accordingly, it is respectfully submitted that Metzger et al. do not render unpatentable claims 15, 19, 21 and 23, by virtue of these claims' dependence on claim 13. *In re Fine*, 837 F.2d 1071 (Fed. Cir. 1988) (any dependent claim that depends from a non-obvious independent claim is non-obvious).

Furthermore, with respect to claim 23, claim 23 recites that the connection carrier is adapted for arrangement in a bobbin of a solenoid. As set forth in the Response, dated October 28, 2004, *In re Venezia*, 530 F.2d 956 (C.C.P.A. 1976), indicates that the phrase "adapted to" does not merely set forth an intended use, but rather sets forth a "present structures or attributes." Nowhere do Metzger et al. disclose or suggest a connection carrier that includes structures or attributes adapted for arrangement in a bobbin of a solenoid. For this additional reason, it is respectfully submitted that Metzger et al. do not render unpatentable claim 23.

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IV. Conclusion

In light of the foregoing, it is respectfully submitted that all of the presently pending claims are in condition for allowance. Prompt reconsideration and allowance of the present application are therefore earnestly solicited.

Respectfully submitted,

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